

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In Re:)	
)	
John L. Holt III)	Case No. 19-35969-KRH
)	Chapter 7
)	
)	
Debtor.)	
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Bayview Loan Servicing)	
)	
Movant)	
)	
v.)	
)	
John L. Holt, III)	
)	
Respondent.)	
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DEBTOR’S OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW the Debtor, John L. Holt, III (the “Debtor”), by the undersigned counsel, and hereby objects to Movant’s Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Debtor filed this Chapter 7 case on November 13, 2019.
2. For several months prior to filing and during the pendency of the bankruptcy, Debtor has been negotiating a modification with the Movant.
3. Debtor is close to reaching a resolution and requests more time to do so.
4. The Chapter 7 Trustee has not abandoned the property as of this date.

5. Debtor, through counsel, just received a notice that effective February 1, 2020 Movant will no longer be the loan servicer on this loan.
6. As a result, by the time the hearing is conducted, the Movant will no longer be the proper party in interest.

WHEREFORE, Respondent respectfully requests this Court to deny Movant's Motion for Relief for the Automatic Stay.

Date: January 24, 2020

Respectfully Submitted,

/S/ Dawn C. Stewart
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Counsel for the Debtor

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on January 24, 2020 I served a copy of the above Objection by electronic means through this Court's ECF system on:

Office of the US Trustee

Chapter 7 Trustee

Counsel for the Movant

/s/ Dawn C. Stewart
Dawn C. Stewart, Esq.